

AYABE, CHONG, NISHIMOTO,
SIA & NAKAMURA, A Limited
Liability Law Partnership

JEFFREY H. K. SIA 3029-0
Pauahi Tower, Suite 2500
1001 Bishop Street
Honolulu, Hawaii 96813
Telephone No.: (808) 537-6119
Facsimile No.: (808) 537-6119
Jeffrey.Sia@hawadvocate.com

SELMAN • BREITMAN LLP

ALAN B. YUTER
RACHEL E. HOBBS
11766 Wilshire Boulevard, Sixth Floor
Los Angeles, California 90025-6538
Telephone: (310) 445-0800
Facsimile: (310) 473-2525
AYuter@SelmanBreitman.com
RHobbs@selmanbreitman.com

Attorneys for Plaintiff
SCOTTSDALE INSURANCE COMPANY

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SCOTTSDALE INSURANCE)	CIVIL NO. CV04 00550 HG/BMK
COMPANY,)	(Declaratory Relief)
)	
Plaintiff,)	PLAINTIFF SCOTTSDALE
)	INSURANCE COMPANY'S
)	STATEMENT OF NO OPPOSITION
vs.)	TO DEFENDANTS SULLIVAN
)	PROPERTIES, INC. AND ROBERT
SULLIVAN PROPERTIES, INC.;)	B. SULLIVAN'S MOTION FOR
ROBERT B. SULLIVAN; MAUI)	STAY OF ENFORCEMENT OF

LAND & PINEAPPLE COMPANY,) JUDGMENT AND FOR APPROVAL
INC.; AND KAPALUA LAND) OF SUPERSEDEAS BOND FILED
COMPANY, LTD.,) ON 10/15/07; CERTIFICATE OF
) SERVICE
Defendants.)
) No trial date set
)

[2004432/#347273]

PLAINTIFF SCOTTSDALE INSURANCE COMPANY'S STATEMENT OF NO
OPPOSITION TO DEFENDANTS SULLIVAN PROPERTIES, INC. AND
ROBERT B. SULLIVAN'S MOTION FOR STAY OF ENFORCEMENT OF
JUDGMENT AND FOR APPROVAL OF SUPERSEDEAS BOND
FILED ON 10/15/07

Plaintiff SCOTTSDALE INSURANCE COMPANY (hereinafter referred to as "Plaintiff"), by and through its attorneys, Ayabe, Chong, Nishimoto, Sia & Nakamura and Selman • Breitman LLP, hereby submits this Statement of No Opposition to Defendants Sullivan Properties, Inc. and Robert B. Sullivan's Motion For Stay Of Enforcement Of Judgment And For Approval Of Supersedeas Bond Filed on 10/15/07 in the above-captioned case. The Plaintiff is not opposed to a stay of enforcement of the Judgment and the request for approval of the supersedeas bond as described in said Motion.

DATED: Honolulu, Hawaii, October 23, 2007.

/s/ Jeffrey H. K. Sia
JEFFREY H. K. SIA
ALAN B. YUTER
RACHEL E. HOBBS
Attorneys for Plaintiff
SCOTTSDALE INSURANCE COMPANY